



THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 Church Street  
NEW YORK, NY 10007

**MURIEL GOODE-TRUFANT**  
*Corporation Counsel*

**JOSEPH ZANGRILLI**  
Phone: (212) 356-2657  
Fax: (212) 356-3509  
jzangril@law.nyc.gov  
*Senior Counsel*

March 3, 2025

**BY ECF**

Honorable Jennifer E. Willis  
United States Magistrate Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: MacNeal v. State of New York, et al.,  
24-CV-6017 (LGS) (JW)

Your Honor:

I am a Senior Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, and the attorney representing defendants City of New York, EMT Ryan Stack, Lt. John Corde, PO Christian Orellana, and PO Grey Castro in the above-referenced matter. I write to correct an error in the City's prior Valentin response (ECF No. 17) regarding the identification of defendant Police Officer Castro.

In its October 7, 2024 letter to the Court, the City identified the defendant as "Police Officer Grey Castro, Shield No. 26994" of the NYPD's 10th Precinct. At the time of our response, Officer Grey Castro was the only officer with the surname Castro assigned to the 10th Precinct, leading to our mistaken identification. However, during this office's subsequent interview with Grey Castro regarding representation, it became apparent that the officer involved in the May 2-3, 2023 incident was not Grey Castro but was actually former NYPD Officer Chandler Castro, who departed from the NYPD shortly thereafter and is currently employed by the Suffolk County Police Department.

The correct service information for former Officer Castro is:

Chandler Castro, c/o Jack McLaughlin  
New York City Law Department  
100 Church Street, Rm. 3-183  
New York, NY 10007

In light of the Court's February 10, 2025 Order (ECF No. 62) setting a briefing schedule for dispositive motions, with all defendants' motions due April 7, 2025, we respectfully propose that the Court deem the complaint amended for purposes of adding Chandler Castro and removing Grey Castro and direct the U.S. Marshals Service to effect service on Officer Chandler Castro, s/h/a Grey Castro, at the above address. This would allow sufficient time for him to be served and for this office to make a representation determination before the motion deadline, thereby avoiding any need to modify the existing briefing schedule or interpose multiple responses.

The City apologizes for any confusion and delay this may have caused and thank the Court for its time and consideration of this matter.

Respectfully submitted,

*Joseph Zangrilli /s/*

Joseph Zangrilli  
Attorney for Defendants City, Grey  
Castro, Corde, Orellana, and Stack  
*Senior Counsel*  
New York City Law Department  
100 Church Street  
New York, NY 10007  
(212) 356-2657  
jzangril@law.nyc.gov

Cc: **VIA ECF**  
Elizabeth Anne Figueira  
New York State Office of the Attorney General  
28 Liberty Street, 15th Floor  
New York, NY 10005  
(212) 416-8528  
Fax: (212) 416-6009  
Email: [elizabeth.figueira@ag.ny.gov](mailto:elizabeth.figueira@ag.ny.gov)  
*Attorney for Codefendants*

Kelly MacNeal  
507 W 28th Street  
Apt. 26D  
New York, NY 10001  
Email: Macnificent2016@gmail.com  
*Plaintiff Pro Se*